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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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RECLAIM THE RECORDS and ALEC  
FERRETTI, : 23 Civ. 1471 (JMF)  
  
Plaintiffs, : NOTICE OF MOTION  
  
-v- :  
UNITED STATES DEPARTMENT OF STATE, :  
  
Defendant. x  
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PLEASE TAKE NOTICE that upon the complaint, defendant's memorandum of law, the Declaration of Regina L. Ballard dated October 24, 2023, and the exhibits thereto, and all other pleadings and proceedings in this action, defendant United States Department of State will move this Court before the Honorable Jesse M. Furman, United States District Judge, United States Courthouse, Courtroom 1105, 40 Foley Square, New York, New York 10007, for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure, and for such other relief as is just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the schedule entered by the Court, plaintiffs' opposition to defendant's motion shall be filed on or before December 8, 2023.

Dated: New York, New York  
October 24, 2023

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York  
*Attorney for Defendants*

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